

Permitting decisions

Part surrender

We have decided to accept the surrender of part of the permit for Huddersfield Chemical Industry operated by Lubrizol Limited.

The permit number is EPR/AP3733LE.

The part surrender number is EPR/AP3733LE/S011.

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state. We consider in reaching that decision we have taken into account all relevant considerations and legal requirements.

Purpose of this document

This decision document provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account.

The decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the surrender notice. The introductory note summarises what the notice covers.

Key issues of the decision

This Huddersfield Chemical Industry permit currently has four different organic chemical listed activities. The installation no longer produces organic compounds containing oxygen therefore this partial surrender is to remove listed activity Section 4.1 A(1) (a) (ii). Reference to emission points to air, A2 and A11, associated with this process have also been removed from the permit.

The ethylene oxide raw material tank which serviced the surrendered activity process has been decommissioned and removed from site.

Low Risk Surrender

We have considered this application as a low risk partial surrender as it meets the criteria in box 1 of "Site condition report – guidance and templates", (H5), version 3, published by us in April 2013. No part of the existing installation footprint is being surrendered.

- The area of the facility subject to the application fits within the low risk criteria;
- The part of the facility being surrendered is not essential for and will not influence or be influenced by the rest of the site; and
- The regulatory effort required to determine the application will not be in excess of the low risk surrender fee.

Pollution Risk

We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility. Potential sources of pollution risk that are being surrendered included ethylene oxide and methanol.

The permitted activity being surrendered have stopped on site for some time. The last manufacture using ethylene oxide was in 2013. The storage vessel, with handling infrastructure, was decommissioned and dismantled in 2014. Reference to the removed ethylene oxide storage vessel was made in the Compliance Assessment Report (CAR) by the Environment Agency inspector for the site, during a site visit in January 2015.

Decommissioning was completed in 2014 and the pollution risk has been removed under the supervision of the site inspector.

A decommissioning plan was developed by the operator and agreed by the Environment Agency to ensure all pollution risk was managed during the decommissioning. The plan detailed the following key steps:

- Levels of the manufacturing product in the storage vessel were reduced to as low as possible prior to decommission;
- The remainder of the ethylene oxide was transferred into the ethoxylation reactor and neutralised;
- The storage vessel was flushed through ten times using water. Two flushes were transferred through the reactor, via associated equipment and pipework, and the remainder straight to drain. All the wash water was then treated at the Syngenta effluent treatment plant;
- The storage vessel, transfer pump, pipework and associated equipment were removed, checked clean prior to taking off site for scrapping;
- The methanol in the chiller unit was run to drain in conjunction with Syngenta, and the chiller unit was washed out with water prior to dismantling and scrapping; and
- Packing used in the water scrubber unit was washed prior to being disposed of.

Ethylene oxide is a colourless flammable gas at room temperature and therefore its use could not have contaminated the land or groundwater within the installation. All equipment associated with the ethylene oxide has now been removed from site.

The decommissioning of the ethylene oxide storage vessel and associated equipment did not require the ground to be touched and the concrete hard standing is still in good condition.

Land and ground water data were not required to be collected as the land was not disturbed during the decommissioning of the ethylene oxide storage vessel and associated equipment and we have no records of any pollution incidents occurring during the lifetime of the permit.

The site submits an annual site protection monitoring plan, which includes information on local boreholes and an off-site groundwater monitoring well. No pollutants associated with ethylene oxide storage were detected in the 2015 analysis.

The land, where the storage vessel and associated equipment was situated is in a satisfactory condition.

We have assessed the information provided in support of the partial surrender and can confirm that it is sufficient to show that pollution risk has been removed and that the site is in a satisfactory state. We therefore accept the application to surrender part of the permit.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on confidentiality.
The facility	
The regulated facility	The permitted regulated facilities have changed as a result of the partial surrender. This partial surrender removes listed activity Section 4.1 A(1) (a) (ii) from the activities table. The equipment associated with the ethylene oxide process has been removed from site and Air Emission Points A2 and A11 are removed from the permit. The installation boundary remains unchanged as a result of the partial surrender. No other activities will change as a result of this proposal.
The site	
Extent of the surrender application	The operator has provided a plan showing the extent of the site of the facility that is to be surrendered. No changes are being made to the installation boundary. We consider this plan to be satisfactory.
Pollution risk	We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility. See key issues section for more details.
Satisfactory state	We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state. In coming to this decision we have had regard to the state of the site before the facility was put into operation. See key issues section for more details.
Permit conditions	
Changes to permit conditions as a consequence of the surrender	The permit conditions have changed as a result of the partial surrender. Listed activity <i>S4.1 A(1) (a) (ii) Producing organic compounds containing oxygen</i> has been removed from the Permit. Tables S1.1, S4.1, S5.1 and S4.4 have been updated to reflect changes made on site. No other conditions have been changed as a result of this partial surrender.